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Comment Regarding: DA 03-3669

Office of the Secretary, Federal Communications Commission
445 twelfth Street, S.W., TW-325
Washington, D.C. 20554

09-344

To Whom It May Concern:

Furuno USA Inc., a wholly owned subsidiary of Furuno Electric Company, is the exclusive distributor of Furuno Marine Electronics Products in the United States. Furuno Electronics Company is a leading world-wide manufacturer of marine electronics communication, navigation, and fishing equipment. Arguably, Furuno offers the widest line of marine electronics products in the world.

Furuno USA is a manufacturer member of the National Marine Electronics Association(NMEA) and Furuno USA supports a network of over 300 retail business dealerships that are authorized to distribute Furuno products in the U.S. Market.

Furuno currently offers an FCC, IMO, and USCG Type Accepted, Class A Universal Automatic Identification System(UAIS) Transponder by the model name FA-100. We were one of the first manufacturers to receive FCC/USCG type acceptance in the U.S. and have been focusing our marketing and training efforts at increasing UAIS awareness for our FA100 product and the UAIS concept in general.

In making these statements with regard to our business and position in the UAIS market, we are both deeply troubled and strongly opposed to the MarITEL, Inc. proposal to become the "AIS Frequency Coordinator" in the United States.

Sanctioning a private company to act as a fee based UAIS Frequency Coordinator is not only unnecessary, it is clearly against the spirit of the AIS design concept and supremely detrimental to the AIS market regarding voluntary AIS installations. Indeed, the UAIS system employs a Self Organizing Time Division Multiple Access(SOTDMA) transponder design that requires no frequency coordination and is completely capable of operation that is independent of any external control.

Additionally, the services that MarITEL proposes to provide in exchange for the fees that they will enact already exist by other means that are fully functional and far less costly.

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The Commission must take the position that UAIS is a revolutionary tool to enhance the safety of inter-ship navigation and collision avoidance. Both the AIS1(87B) and AIS2(88B) frequencies must be designated and protected from profiteering so that UAIS may be allowed to flourish within the maritime community. Consequently, UAIS will only function to save lives and reduce the number of disastrous collisions at sea if a high percentage of ALL vessels participate in the system.

As a UAIS Manufacturer, Furuno has struggled to compete by reducing our UAIS transponder manufacturing costs. To do this, we have planned for future competition and manufacturing volumes on the basis that UAIS will be free to be utilized worldwide. Imposing any form of registration and annual renewal fees not only greatly reduces the potential UAIS market that we have anticipated but, it also unfairly burdens the owners and operators of mandatory UAIS vessels who already have to struggle with the costs of purchasing and installing the UAIS equipment to fulfill their carriage requirements.